WILSON ELSER
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June 11, 2018

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Attorney General Xavier Becerra
Office of the Attorney General
California Department of Justice
Attn: Public Inquiry Unit
P.O. Box 944255
Sacramento, California 94244

Re: Data Security Incident

Dear Attorney General Becerra:

We represent Denise M. Bowden, LAc, M.S., with respect to an incident involving the potential exposure of certain personal information described in detail below.

On April 30, 2018, Ms. Bowden discovered that her office had been burglarized and a computer was stolen. The password protected computer contained patients' names, addresses and contact information, and itemized receipts that included dates of service, diagnosis codes and procedure codes. Ms. Bowden immediately filed a police report with the San Francisco Police Department and took steps to identify anyone potentially impacted by this incident.

Ms. Bowden determined that approximately 503 California residents were affected in this incident. As per California Civil Code section 1798.82 and the HIPAA Breach Notification Rule, Ms. Bowden sent notification letters to the affected individuals on June 11, 2018. Enclosed is a copy of the notification letter, which informs the affected California residents about the 12 months of credit monitoring and identity theft protection services that is being offered to them.

Ms. Bowden has taken steps to prevent similar events from occurring in the future, including reviewing and revising her information security policies and procedures. If you have any additional questions, please contact me at gregory.bautista@wilsonelser.com or (914) 872-7839.

Very truly yours,

Wilson Elser Moskowitz Edelman & Dicker LLP

Gregory J. Bautista

C/O ID Experts
10300 SW Greenburg Rd. Ste. 570
Portland, OR 97223

[First_Name][Last_Name]
[Street_Address]
[City][State][Zip]

[Date]

Re: Notice of Data Breach

Dear [First_Name][Last_Name]:

I am writing to inform you of an incident that may have resulted in the disclosure of your name, address and limited health information. I take the security of your information very seriously and sincerely apologize for any inconvenience this incident may cause. This letter contains information about what occurred and steps you can take to protect your information.

What happened and what information was involved:

Over the weekend of April 28, 2018, my office was burglarized and a computer used by my reception staff was stolen. The password protected computer contained your name, address and contact information, and possibly itemized receipts with dates of service, diagnosis codes and procedure codes. When I discovered this incident the following Monday morning, I immediately contacted the San Francisco police department and took steps to identify anyone who was potentially impacted.

What I am doing and what you can do:

While I am not aware of any misuse of your information, because I value you and the safety of your information, I have arranged for you to enroll with ID Experts®, an incident response and recovery services expert, to provide you with MyIDCare™ services at no cost to you. MyIDCare services include:

- 12 months of Credit and CyberScan dark web monitoring;
- $1,000,000 insurance reimbursement policy;
- Exclusive educational materials; and
- Fully managed Identity Theft Recovery Services (with this protection, MyIDCare will help you resolve issues if your identity is compromised).

We encourage you to contact ID Experts with any questions and to enroll in free MyIDCare services by calling 1-800-939-4170 or going to https://app.myidcare.com/account-creation/protect and providing your enrollment code: [Enrollment Code]. Please note the deadline to enroll is [90 days from mailing].

I want to assure you that I have taken steps to prevent a similar event from occurring, including reviewing and revising my information security policies and procedures to minimize this risk in the future.

For more information:

I sincerely regret any inconvenience that this incident may cause you, and remain dedicated to protecting your personal information. Should you have any questions or concerns about this incident, please contact 1-800-939-4170 between 6:00 AM and 5:00 PM Pacific or visit https://app.myidcare.com/account-creation/protect for more information.

Sincerely,

Denise M. Bowden

Additional Important Information

For residents of *Hawaii, Michigan, Missouri, Virginia, Vermont,* and *North Carolina*: It is recommended by state law that you remain vigilant for incidents of fraud and identity theft by reviewing credit card account statements and monitoring your credit report for unauthorized activity.

For residents of *Illinois, Iowa, Maryland, Missouri, North Carolina, Oregon,* and *West Virginia*:
It is required by state laws to inform you that you may obtain a copy of your credit report, free of charge, whether or not you suspect any unauthorized activity on your account. You may obtain a free copy of your credit report from each of the nationwide three credit reporting agencies. To order your free credit report, please visit www.annualcreditreport.com, or call toll-free at 1-877-322-8228. You can also order your annual free credit report by mailing a completed Annual Credit Report Request Form (available at https://www.consumer.ftc.gov/articles/0155-free-credit-reports) to: Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA, 30348-5281.

For residents of *Iowa*:
State law advises you to report any suspected identity theft to law enforcement or to the Attorney General.

For residents of *Oregon*:
State laws advise you to report any suspected identity theft to law enforcement, including the Attorney General, and the Federal Trade Commission.

For residents of Maryland, Rhode Island, Illinois, and North Carolina:
You can obtain information from the Maryland and North Carolina Offices of the Attorneys General and the Federal Trade Commission about fraud alerts, security freezes, and steps you can take toward preventing identity theft.

Maryland Office of the Attorney General
Consumer Protection Division
200 St. Paul Place
Baltimore, MD 21202
1-888-743-0023
www.oag.state.md.us

Rhode Island Office of the Attorney General
Consumer Protection
150 South Main Street
Providence RI 02903
1-401-274-4400
www.riag.ri.gov

North Carolina Office of the Attorney General
Consumer Protection Division
9001 Mail Service Center
Raleigh, NC 27699-9001
1-877-566-7226
www.ncdoj.com

Federal Trade Commission
Consumer Response Center
600 Pennsylvania Ave, NW
Washington, DC 20580
1-877-IDTHEFT (438-4338)
www.ftc.gov/idtheft

For residents of *Massachusetts*: It is required by state law that you are informed of your right to obtain a police report if you are a victim of identity theft

For residents of all states:

Fraud Alerts: You can place fraud alerts with the three credit bureaus at one of the three major credit bureaus by phone and also via Experian's or Equifax's website. A fraud alert tells creditors to follow certain procedures, including contacting you, before they open any new accounts or change your existing accounts. For that reason, placing a fraud alert can protect you, but also may delay you when you seek to obtain credit. The contact information for all three credit bureaus is below:

Monitoring: You should always remain vigilant and monitor your accounts for suspicious or unusual activity.

Security Freeze: You also have the right to place a security freeze on your credit report. A security freeze is intended to prevent credit, loans and services from being approved in your name without your consent. To place a security freeze on your credit report, you need to make a request to each consumer reporting agency. You may make that request by certified mail, overnight mail, or regular stamped mail, or by following the instructions found at the websites listed below. The following information must be included when requesting a security freeze (note that if you are requesting a credit report for your spouse, this information must be provided for him/her as well): (1) full name, with middle initial and any suffixes; (2) Social Security number; (3) date of birth; (4) current address and any previous addresses for the past five years; and (5) any applicable incident report or complaint with a law enforcement agency or the Registry of Motor Vehicles. The request must also include a copy of a government-issued identification card and a copy of a recent utility bill or bank or insurance statement. It is essential that each copy be legible, display your name and current mailing address, and the date of issue. The consumer reporting agency may charge a small fee to place, life, or remove a freeze, but is free if you are a victim of identity theft or the spouse of a victim of identity theft, and you have submitted a valid police report relating to the identity theft incident to the consumer reporting agency. You may obtain a security freeze by contacting any one or more of the following national consumer reporting agencies:

Equifax Security Freeze
P.O. Box 105788
Atlanta, GA 30348
www.freeze.equifax.com
800-525-6285

Experian Security Freeze
P.O. Box 9554
Allen, TX 75013
www.experian.com/freeze
888-397-3742

TransUnion (FVAD)
P.O. Box 2000
Chester, PA 19022
freeze.transunion.com
800-680-7289

More information can also be obtained by contacting the Federal Trade Commission listed above